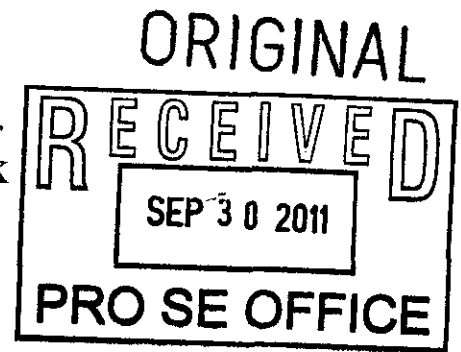


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK



RENY RIVERO

Plaintiff

-v-

CASH LLC

DANIELS & NORELLI PC
(WILL ADD MORE DEFENDANTS AS
INFORMATION IS RECEIVED)

317 Chambers ST NY 10007
Defendants

Case No. _____



11 -

4810

COMPLAINT AND DEMAND
FOR JURY TRIAL

VITALIANO,
BLOOM, M.J.

COMPLAINT

Plaintiff, Reny Rivero, individually, hereby sues Defendants, CASH LLC, DANIELS & NORELLI PC, for violations of the Fair Debt Collection Practices Act (FDCPA) 15 U.S.C. § 1692.

PRELIMINARY STATEMENT

1. This is an action for damages and injunctive relief brought by Plaintiff against Defendant for violations of the Fair Debt Collection Practices Act (FDCPA) 15 U.S.C. § 1692 e, Fair Debt Collection Practices Act (FDCPA) 15 USC § 1692 e(2), Fair Debt Collection Practices Act (FDCPA) 15 USC § 1692 f, Fair Debt Collection Practices Act (FDCPA) 15 U.S.C. § 1692 f(1), Fair Debt Collection Practices Act (FDCPA) 15 USC § 1692 a(3), Fair Debt Collection Practices Act (FDCPA) 15 USC § 1692 a(5), Fair Debt

Collection Practices Act (FDCPA) 15 USC § 1692 d, Fair Debt Collection Practices Act (FDCPA) 15 USC § 1692 g(b).

2. Upon belief and information, Plaintiff contends that many of these practices are widespread for some or all of the Defendants. Plaintiff intends to propound discovery to Defendants identifying these other individuals who have suffered similar violations.
3. Plaintiff contends that the Defendants have violated such laws by repeatedly harassing Plaintiff in attempts to collect alleged but nonexistent debt.

JURISDICTION AND VENUE

4. Jurisdiction of this Court arises under 15 U.S.C. §1681p. Defendants, **CASH LLC, DANIESL & NORELLI PC**, are licensed by NY CITY DEPARTMENT OF CONSUMER AFFAIRS LICENSES # 1253378 and 1312885 .
5. Venue is proper pursuant to 28 U.S.C. §1391b Venue in this District is proper in that the Plaintiff resides here, the Defendants transact business here, and the conduct complained of occurred here.
6. This is an action for damages which exceed \$10,000.00.

PARTIES

7. Plaintiff, Reny Rivero, is a natural person and is a resident of the State of New York.

FACTUAL ALLEGATIONS

8. On or about December 08, 2009 the Defendant got a Richmond County Court default judgment demanding payment from some unknown account.
9. On or about September 08, 2009 the Plaintiff demand validation pursuant to 15 USC. § 1692g(b). See exhibit "A"
10. Plaintiff has no contractual obligation to pay Defendants.
11. Defendant CASH LLC, **DANIESL & NORELLI PC** failed to attach the alleged member agreement or any evidence that Plaintiff ever had an account with Cash LLC.

**COUNT I
VIOLATION OF FAIR DEBT COLLECTION
PRACTICES ACT (FDCPA), 15 U.S.C. §1692
BY DEFENDANT E FORSTER & GARBUS LLP**

12. Plaintiff alleges and incorporates the information in paragraphs 1 through 11.
13. Plaintiff is a consumer within the meaning of the FDCPA, 15 U.S.C. §1692a(3)
14. Defendant Upon information and belief Defendant, CASH LLC. (NEW YORK DEPARTMENT OF STATE HAS NOT REGISTERED CASH LLC. IT IS A FOREIGN ENTITY. "**DANIESL & NORELLI PC**" is a known entity authorized to do business in New York. **DANIESL & NORELLI PC** collects debts under NY CITY DEPARTMENT

LICENSE # 1312885 is a debt collector within the meaning of the FDCPA, 15 U.S.C. §1692a(6).

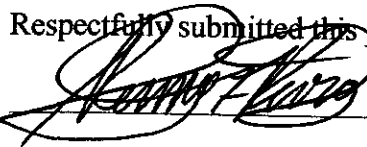
15. All Defendants violated the FDCPA. Defendant's violations include, but are not limited to, the following:
- (a) Defendants violated 15 U.S.C. §1692e(2) by falsely representing the character, amount, or legal status of any debt.
 - (b) Defendants violated 15 U.S.C. §1692f(1) by the collection of any amount (including any interest, fee, charge, or expense incidental to the principal obligation) unless such amount is expressly authorized by the agreement creating the debt or permitted by law.
 - (c) Defendants continued collection activity after receiving notice of dispute, and failed to provide written validation of debt before resuming collection activities, in violation of 15 U.S.C. §2042g(b).

WHEREFORE, Plaintiff demands judgment for damages against CASH LLC, DANIESL & NORELLI PC for actual or statutory damages, and punitive damages, attorney's fees and costs, pursuant to Fair Debt Collection Practices Act § 813. Civil Liability [15 USC 1692k]

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury of all issues so triable as a matter of law.

Respectfully submitted this 30TH of September, 2011


Reny Rivero
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Staten Island, NY 10301
(718) 815-5712